

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Frieda K. Zimmerman
5 Jeremy J. Kelley
6 Assistant United States Attorney
7 Post Office Box 1494
8 Spokane, WA 99210-1494
9 Telephone: (509) 353-2767

10 UNITED STATES DISTRICT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANDREI S. BORGHERIU,

16 Defendant.

Case No.: 4:22-CR-6040-SAB

United States' Witness List

17 Plaintiff, United States of America, by and through Vanessa R. Waldref
18 United States Attorney for the Eastern District of Washington, and Frieda K.
19 Zimmerman and Jeremy J. Kelley, Assistant United States Attorney, submits the
20 following Witness List.

- 21 1. Special Agent Christian L. Parker, Federal Bureau of Investigation
- 22 2. Special Agent Alex Meusburger, U.S. Small Business Administration
23 Office of Inspector General
- 24 3. Raymond Brown, U.S. Small Business Administration
- 25 4. Custodian of Records, Bank of America
- 26 5. Custodian of Records, Federal Reserve Bank of New York
- 27 6. Custodian of Records, Internal Revenue Service
- 28 7. Dylan Strait, Ticor Title

1 8. Erick Simmons, Pillar to Post

2 9. Nikica Lacic

3 10. Julijana Imamovic

4 11. Daniel Lacic

5 12. Guelita Pericles

6 In addition to the above names, though it does not intend to do so at this time
7 based on the sworn certifications and notice that have been previously provided to
8 the Defendant, the United States reserves the right to call additional custodians of
9 records as needed to establish authenticity and admissibility of business records kept
10 in the ordinary course of business, which have been previously provided to
11 Defendant together with notice of intent to offer those records through certificate.

12 The United States reserves the right to supplement its witness list if needed
13 based on trial documents submitted by Defendant.

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15 Dated: February 3, 2025.

16 Vanessa R. Waldref
17 United States Attorney

18 s/ Frieda K. Zimmerman

19 Frieda K. Zimmerman

20 Jeremy J. Kelley

21 Assistant United States Attorneys
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CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

s/ Frieda K. Zimmerman

Frieda K. Zimmerman

Assistant United States Attorney